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LORETTA ROLLAND, et al.

Plaintiffs,

v.

MITT ROMNEY, et al.

Defendants.

Civil Action No. 98-30208-KPN

U.S. DISTRICT COURT
DISTRICT OF MASS.

AFFIDAVIT OF ANDREA H. MAISLEN

Andrea H. Maislen, being duly sworn, deposes and says:

1. I am an assistant general counsel in the Office of the General Counsel of the Department of Mental Retardation. I have served in this capacity since September 4, 2001. I have been a member of the Massachusetts bar since 1982.
2. I have personal knowledge of the facts stated herein, except where indicated and as to those facts I believe them to be true.
3. I reviewed all of the billing records submitted by the plaintiffs' attorneys in connection with their fee petition. I reviewed all of them line by line from beginning to end. I then reviewed each submission looking separately at various categories, including: time billed on fee matters; time billed for travel; time billed for work on the post-trial "Findings of Fact"; time billed on research, drafting and conferring on the post-trial brief; time billed on internal conferences and conference calls where there were more than two lawyers participating; time billed by Mr. Belin "reviewing and revising" the work of other attorneys; time billed by Ms. Hatrick for supervising the work of summer associates; and time billed for depositions in which more than two lawyers participated.
4. For each of the categories described in paragraph 3, I created a chart which recorded date, time billed, description of the work done, whether the work was recorded along with other tasks ("block billing"); and, if there was block billing, what percentage of the time I allocated to the tasks recorded on the chart. These charts are attached hereto as Exhibits A – H.

5. In allocating time billed as described in paragraph 4, I took the total number of tasks listed and divided that into the total amount of time recorded to arrive at the amount I allocated to the particular task reflected on each chart.
6. In addition I reviewed calculations done by Peter Mimmo, a paralegal in the Office of the General Counsel, regarding time billed on expert tours and time billed by Ms. Boundy for secretarial or clerical work.

Signed under the pains and penalties of perjury this 30th day of May, 2003.


Andrea H. Maislen

EXHIBIT A

SJS

This worksheet analyzes the internal conferences and conference calls Attorney Steven Schwarz participated in with two or more lawyers. The worksheet calculates the total number of hours Attorney Schwarz devotes to these conferences, multiplies it by his compromised hourly rate, and generates a "lodestar."

Compromised Hourly Rate:
\$275.00

| Date | Entry | Billing | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------|---------|----------|
| | | Hours | Amount |
| 12-Jan-01 | Conf w/ Dick, Matthew, & Cathy | 0.9 | \$247.50 |
| 2-Apr-01 | Telephone conf. w/ Marcia, Cathy, Matthew, Frank and Dick to discuss next steps | 1.5 | \$412.50 |
| 6-Jun-01 | Telephone conf. Call with co-counsel to discuss motion on Tom York and response, active treatment review and schedule motion for further relief | 1.3 | \$357.50 |
| 11-Jun-01 | Telephone conference call with cocounsel to discuss active treatment review | 0.7 | \$192.50 |
| 19-Jun-01 | Telephone conf. Call w/ co counsel to discuss joint active treatment review | 1.2 | \$330.00 |
| 2-Jul-01 | Telephone conf. Call with cocounsel to discuss active treatment review | 1.2 | \$330.00 |
| 9-Jul-01 | Telephone conf. Call w. Cathy, Chris, Dick and Matthew to discuss strategy on dealing with AG's office on active treatment | 0.8 | \$220.00 |
| 18-Jul-01 | Conference w/ co-counsel re: DMR proposal and list of expert to submit to defendants | 1 | \$275.00 |

| | | | | |
|-----------|---------------------------------------------------------------------------------------------------------------------------------|------|-----|------------|
| 20-Jul-01 | Telephone conference call with co-counsel to discuss defendants' candidate | 0.7 | | \$192.50 |
| 23-Jul-01 | Conf. With cocounsel to prepare for hearing | 0.5 | | \$137.50 |
| 24-Jul-01 | Conf with Cathy and Frank re: joint expert | 0.2 | | \$55.00 |
| 26-Jul-01 | Telephone conf. To Frank, Cathy re: appeal of fee decision | 0.4 | | \$110.00 |
| 13-Aug-01 | Telephone conf. Call with cocounsel to discuss response to discovery status of expert review and defendants' response to motion | 1.8 | | \$495.00 |
| 5-Sep-01 | Conf. W/ counsel re: defendants' response to discovery, motion to prohibit [etc] | 4.2 | | \$1,155.00 |
| 21-Sep-01 | Conf. W/ counsel to review hearing & order | 0.4 | | \$110.00 |
| 25-Sep-01 | Conf. W/ co-counsel re: depositions, motions to compel [etc] | 2.5 | | \$687.50 |
| 2-Oct-01 | Telephone conference call w/ Tom York, Cathy, Dick to discuss supplemental answers to interrogatories | 0.7 | | \$192.50 |
| | Telephone conf. Call with Frank & Cathy to discuss compromise on extension. | 0.45 | 1/2 | \$123.75 |
| 9-Oct-01 | Telephone conf. Call with co-counsel to discuss defendants' legal strategy [etc] | 1.1 | | \$302.50 |
| 15-Oct-01 | Telephone conf. W/ co-counsel to discuss defendants' expert report | 1.2 | | \$330.00 |
| 16-Oct-01 | Telephone conf. Call w/ co-counsel to discuss supplemental scheduling order & expert deposition strategy | 1.4 | | \$385.00 |
| 26-Oct-01 | Telephone conf. Call w/ co counsel to discuss pending motions | 1.4 | | \$385.00 |
| 29-Oct-01 | Telephone conf. Call w/ co counsel to discuss trial strategy, witnesses, exhibits, & further motions | 1.5 | | \$412.50 |
| 1-Nov-01 | Telephone conf call with co-counsel to discuss exhibits, witnesses, pretrial conference, and further motions | 1.9 | | \$522.50 |

| | | | |
|---------------------|----------------------------------------------------------------------------------------------------------------------------|--------------|--------------------|
| 2-Nov-01 | Telephone conf. Call with cocounsel to discuss trial exhibits, witnesses trial plan | 1.3 | \$357.50 |
| 4-Nov-01 | Telephone conf. Call with co-counsel to discuss affidavits, exhibits, witnesses, cut off date, opening & trial assignments | 1.1 | \$302.50 |
| | Conf. With co-counsel re; strategy for motion in limine | 0.4 | \$110.00 |
| 19-Nov-01 | Telephone conf. Call with co-counsel to discuss outline of assignments for proposed findings and legal memo | 1.2 | \$330.00 |
| 23-Jan-02 | Conf. W. co-counsel re: strategies for monitoring and enforcing settlement agreement | 2.5 | \$687.50 |
| | Prepare for hearing with cocounsel | 1 | \$275.00 |
| 16-May-02 | Telephone conf call with co-counsel to discuss implementation of court order | 1.3 | \$357.50 |
| 31-Jul-02 | Conf w/ co-counsel to prepare for hearing on active treatment policy | 0.5 | \$137.50 |
| | Conf w/ co-counsel re; appeals court brief monitoring of community placement | 1.1 | \$302.50 |
| 13-Sep-02 | Telephone conf. Call with co-counsel to discuss response to motion to strike [etc] | 0.9 | \$247.50 |
| Grand Totals | | 37.85 | \$10,408.75 |

Costanzo

This worksheet analyzes the internal conferences and conference calls Attorney Cathy Costanzo participated in with two or more lawyers. The worksheet calculates the total number of hours Attorney Costanzo devotes to these conferences, multiplies it by her compromised hourly rate, and generates a "lodestar."

Compromised Hourly Rate:

\$205.00

| | | Billing | | |
|-----------|------------------------------------------------------------------------------------------|---------|-------------|----------|
| Date | Description | Hours | Apportioned | Amount |
| 26-Jan-01 | Telephone conf w/ cocounsel to discuss strategy | 1 | | \$205.00 |
| 2-Apr-01 | Telephone conference call w/ Steven, Marcia, Matthew, Frank & Dick to discuss next steps | 1.5 | | \$307.50 |
| 14-May-01 | Telephone conf call w/ cocounsel re: strategy | 1 | | \$205.00 |
| 6-Jun-01 | Telephone conference call with cocounsel to discuss scheduling conference | 1.3 | | \$266.50 |
| 11-Jun-01 | Conference with Matthew, Steve, Marcia re: next steps, research | 0.3 | | \$61.50 |
| | Telephone conference with cocounsel to discuss hearing, defs proposal | 0.7 | | \$143.50 |
| 19-Jun-01 | Telephone conference call with cocounsel to discuss joint active treatment review | 1.2 | | \$246.00 |
| 21-Jun-01 | Conference with cocounsel re: active treatment standard | 0.4 | | \$82.00 |

| | | | | |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|--|----------|
| 2-Jul-01 | Telephone conference call with cocounsel to discuss strategy | 1.2 | | \$246.00 |
| 9-Jul-01 | Telephone conference call with cocounsel to discuss strategy for approaching AG & defs on active treatment | 0.8 | | \$164.00 |
| 16-Jul-01 | Conference w/ Frank & Steve re: joint expert | 0.2 | | \$41.00 |
| 18-Jul-01 | Telephone conference call with cocounsel to discuss strategy | 1 | | \$205.00 |
| 20-Jul-01 | Telephone conference call with cocounsel | 0.7 | | \$143.50 |
| 23-Jul-01 | Telephone conference call with cocounsel | 0.7 | | \$143.50 |
| | Conference with cocounsel to prepare for hearing | 0.7 | | \$143.50 |
| | Conference w/ cocounsel re: sampling process | 0.7 | | \$143.50 |
| 24-Jul-01 | Conf w/ Steve & Frank re: joint expert | 0.2 | | \$41.00 |
| 2-Aug-01 | Conf with Frank & Steve re: call with Lyn Rucker | 0.3 | | \$61.50 |
| 13-Aug-01 | Telephone conf call with cocounsel to discuss discovery, strategy, tours | 1.8 | | \$369.00 |
| 5-Sep-01 | Conference with cocounsel re: strategy, next steps, defs response to discovery, motion to prohibit use of client information, depositions and expert reports and trial | 4.2 | | \$861.00 |
| 21-Sep-01 | Conference w/ cocounsel re: strategy for hearing | 0.5 | | \$102.50 |
| | Conference with cocounsel re: order and hearing | 0.5 | | \$102.50 |
| 25-Sep-01 | Conference with co-counsel re: strategy, assignments, and trial prep. | 2.5 | | \$512.50 |

| | | | | |
|-----------|----------------------------------------------------------------------------------------------------------------|-----|--|----------|
| 2-Oct-01 | Telephone conference call with Tom York, Steve, Dick Belin, to discuss supplemental answers to interrogatories | 0.7 | | \$143.50 |
| | Telephone conference call with Steve & Dick to discuss compromise on motion to extend | 0.4 | | \$82.00 |
| 15-Oct-01 | Telephone conference call with cocounsel to discuss division of responsibilities, discovery | 1.2 | | \$246.00 |
| 16-Oct-01 | Telephone conference call with cocounsel to discuss supplemental scheduling order of expert | 1.4 | | \$287.00 |
| 22-Oct-01 | Telephone conference call with Kristi & Dick to discuss Daubert motion | 0.2 | | \$41.00 |
| 23-Oct-01 | Telephone conference call with Kristi & Matthew | 0.2 | | \$41.00 |
| 25-Oct-01 | Telephone conference call with Leo Sarksissian and Joe to discuss strategy | 1.3 | | \$266.50 |
| 26-Oct-01 | Telephone conference call w/ cocounsel to discuss trial strategy, division of work | 1.4 | | \$287.00 |
| 29-Oct-01 | Telephone conference with cocounsel to discuss trial plan | 1.5 | | \$307.50 |
| 1-Nov-01 | Telephone conference with cocounsel to discuss strategy | 1.9 | | \$389.50 |
| | Telephone conference call w/ cocounsel to discuss exhibits, witnesses, pretrial conference & further motions | 1.9 | | \$389.50 |
| 2-Nov-01 | Telephone conference call w/ cocounsel to discuss strategy, trial assignments, witnesses | 1.9 | | \$389.50 |
| 4-Nov-01 | Telephone conference with cocounsel to discuss defs' proposed exhibits, objections, fact cut off | 1.1 | | \$225.50 |

| 6-Nov-01 | Yes | Conference with cocounsel | 1.3 | 1/3 | \$266.50 |
|---------------------|-----|-------------------------------------------------------------------------------------------|-------------|-----|-------------------|
| 19-Nov-01 | | Telephone conference w/ cocounsel to discuss structure of findings of fact and legal memo | 1.2 | | \$246.00 |
| 23-Jan-02 | | Conference w/ cocounsel re: preparation for hearing | 1 | | \$205.00 |
| | | Conference w/ cocounsel re: strategy on diversion community placements independent expert | 3 | | \$615.00 |
| 6-Mar-02 | | Conference w/ Matthew, Frank and Steve re: strategy on fee petition | 0.2 | | \$41.00 |
| 16-May-02 | | Telephone conf. W/ cocounsel to discuss strategy, fees, order, implementation | 1.3 | | \$266.50 |
| 20-Jun-02 | | Telephone conference with cocounsel to discuss DMR draft policy, meeting with DMR | 0.7 | | \$143.50 |
| 31-Jul-02 | | Conf w/ cocounsel to prepare of prehearing on active treatment policy | 0.5 | | \$102.50 |
| | | Conf w/ cocounsel re: appeals brief | 1.1 | | \$225.50 |
| 13-Sep-02 | | Telephone conf call w/ cocounsel to discuss response to motion to strike | 0.9 | | \$184.50 |
| Grand Totals | | | 44.6 | | \$9,143.00 |

Belin

This worksheet analyzes the internal conferences and conference calls Attorney Richard Belin participated in with two or more lawyers. The worksheet calculates the total number of hours Attorney Belin devotes to these conferences, multiplies it by his compromised hourly rate, and generates a "lodestar."

Compromised Hourly Rate:

\$257.50

| | | Entry Description | Billing | | |
|-----------|-----|----------------------------------------------------------------------------------------------|---------|-------------|----------|
| | | | Hours | Apportioned | Amount |
| 6-Jun-01 | Yes | Telephone conference w/ Schwarz, et al re York intervention court hearing and related issues | 0.5 | 1/3 | \$128.75 |
| 11-Jun-01 | Yes | Telephone conference w/ Schwarz, Lask et al reviewing ct scheduling order | 0.3 | 1/3 | \$77.25 |
| 19-Jun-01 | | Telephone conference w/ Schwarz, Costanzo, et al | 0.8 | | \$206.00 |
| 9-Jul-01 | | Telephone conference with Schwarz et al regarding settlement negotiation issues | 0.6 | | \$154.50 |
| 18-Jul-01 | | Telephone conf w/ Schwarz et al. | 0.6 | | \$154.50 |
| 20-Jul-01 | | Telephone conf with Costanzo et al re: expert issues | 0.6 | | \$154.50 |
| 13-Aug-01 | | Telephone conf w/ Schwarz et al re expert & discovery issues and hearing prep | 2.3 | | \$592.25 |
| 21-Sep-01 | Yes | Telephone conference with Schwarz and Hatrick | 0.2 | 1/2 | \$51.50 |
| 25-Sep-01 | Yes | Meeting w/ Schwarz et al re: discovery issues and trial planning | 1.1 | 1/3 | \$283.25 |

| | | | | | |
|-----------|-----|--------------------------------------------------------------------------|-------|------|------------|
| 2-Oct-01 | | With Hatrick & telephone conf w/ Schwarz et al re: discovery | 1.3 | | \$334.75 |
| 15-Oct-01 | Yes | Telephone conf w/ Schwarz et al. | 0.3 | 1/4 | \$77.25 |
| 16-Oct-01 | Yes | Telephone conf w/ Schwarz et al | 0.7 | 1/3 | \$180.25 |
| 24-Oct-01 | Yes | Telephone conference w/ Costanzo & Schwarz | 0.25 | 1/7 | \$64.38 |
| 26-Oct-01 | Yes | Telephone conference with Schwarz et al. | 0.65 | 1/2 | \$167.38 |
| 29-Oct-01 | Yes | Telephone conf with Schwarz et al. | 1.5 | 1/2 | \$386.25 |
| 1-Nov-01 | Yes | Telephone conf with Schwarz et al. | 0.76 | 1/5 | \$195.70 |
| 19-Nov-01 | Yes | Telephone conf with Schwarz et al. | 0.6 | 1/3 | \$154.50 |
| 16-May-02 | Yes | Prep for and participate w/ conf call w/ S. Schwarz et al re: next steps | 1.1 | 9/10 | \$283.25 |
| 13-Sep-02 | Yes | Telephone conf w/ S. Schwarz et al re: issues | 0.7 | 1/3 | \$180.25 |
| | | | 12.06 | | \$3,105.45 |

Hatrick

This worksheet analyzes the internal conferences and conference calls Attorney Kristi Hatrick participated in with two or more lawyers. The worksheet calculates the total number of hours Attorney Hatrick devotes to these conferences, multiplies it by her compromised hourly rate, and generates a "lodestar."

Compromised Hourly Rate:
\$120.00

| | | Entry | | Billing | |
|-----------|-----|--------------------------------------------------------------------------------------------------------|--------------|---------|----------|
| | | Hours | Appportioned | Amount | |
| 5-Sep-01 | Yes | Met with team to review def's responses to discover [etc] | 2.1 | 1/3 | \$252.00 |
| 25-Sep-01 | Yes | Team mtg w/ S. Schwarz, C. Costanzo, R. Belin, F. Laski, M. Engel | 2.1 | 1/3 | \$252.00 |
| 2-Oct-01 | Yes | Conf call re: answers to Ints, scheduling with D. Belin, S. Schwarz, C. Costanzo & T. York | 2.6 | 1/3 | \$312.00 |
| 15-Oct-01 | Yes | Conf call with team | 0.8 | 1/4 | \$96.00 |
| 16-Oct-01 | Yes | Participated in conf call with team re: motion in limine | 2.9 | 1/2 | \$348.00 |
| 17-Oct-01 | Yes | Conf call w/ M. Engel and D. Belin re: motion in limine | 2.4 | 1/3 | \$288.00 |
| 22-Oct-01 | Yes | Conf call w/ R. Belin, S. Schwarz, M. Engel, re: Motion in limine; conf call w/ R. Belin & C. Costanzo | 4.3 | 1/2 | \$516.00 |
| 26-Oct-01 | | Team conf call | 1 | | \$120.00 |
| 29-Oct-01 | Yes | Conf call w/ Team to discuss trial prep ans assignments | 3.9 | 1/3 | \$468.00 |
| 2-Nov-01 | Yes | Conf call with team re: pretrial conf | 1.1 | 1/3 | \$132.00 |
| 19-Nov-01 | Yes | Team conf call re: post trial briefing | 2.2 | 1/3 | \$264.00 |

| | | | | | |
|-----------|-----|-----------------------------------------------------------------------------------------------------------------------------------|-------------|-----|-------------------|
| 16-May-02 | | Team conf call re: Magistrate Neiman's decision strategy going forward, etc. | 1.1 | | \$132.00 |
| 20-Jun-02 | Yes | Team conf call w/ Schwarz, Laski, Engel, Costanzo | 0.3 | 1/4 | \$36.00 |
| 13-Sep-02 | Yes | Discussed with S. Schwarz, F. Laski, C. Costanzo and R. Belin pros & cons of making Section 1292 jurisdiction argument with brief | 1.1 | 1/3 | \$132.00 |
| | | Grand Totals | 17.4 | | \$2,088.00 |

Engel

This worksheet analyzes the internal conferences and conference calls Attorney Matthew Engel participated in with two or more lawyers. The worksheet calculates the total number of hours Attorney Engel devotes to these conferences, multiplies it by his compromised hourly rate, and generates a "lodestar."

Compromised Hourly Rate:
\$205.00

| | | | | | Billing | |
|-----------|-----|-----------------------------------------------------|--|-----|---------|----------|
| | | | | | Hours | Amount |
| 14-May-01 | | P conference call on AT strategy | | | 0.8 | \$164.00 |
| 22-May-01 | Yes | Tcs & mails w/ experts and cocounsel re: AT | | 1/2 | 0.5 | \$102.50 |
| 6-Jun-01 | | P conference call on AT motion | | | 1.3 | \$266.50 |
| 11-Jun-01 | | Conf. MB, SJS, and CEC re research | | | 0.3 | \$61.50 |
| | | P conference call re: experts | | | 0.7 | \$143.50 |
| 19-Jun-01 | | P conference call re: expert tours | | | 0.8 | \$164.00 |
| 2-Jul-01 | | P conference call re: SS compliance | | | 1.1 | \$225.50 |
| 9-Jul-01 | | P conf call call re: York and AG | | | 0.8 | \$164.00 |
| 23-Jul-01 | | P attorney pre court mtg | | | 0.5 | \$102.50 |
| | | P attorney conference call re: sampling methodology | | | 0.7 | \$143.50 |
| 13-Aug-01 | | P conf call re: discovery | | | 1.8 | \$369.00 |
| 15-Oct-01 | | P conf call re: expert report | | | 1.2 | \$246.00 |
| 26-Oct-01 | | P conf call re: trial strategy & motions | | | 1.4 | \$287.00 |
| 1-Nov-01 | | P cocounsel mtg on trial strategy | | | 1 | \$205.00 |
| 2-Nov-01 | | Trial strategy conf call | | | 1.3 | \$266.50 |
| 4-Nov-01 | | P conference call on trial prep | | | 1.1 | \$225.50 |
| | | P conf call on motion limine | | | 0.4 | \$82.00 |
| 8-Nov-01 | | Consult with cocounsel and time keeping | | | 1.5 | \$307.50 |
| 19-Nov-01 | | conference call re: post hearing, filings | | | 1.2 | \$246.00 |

| | | | |
|-----------|--------------------------------------------------------------------|-------------|-------------------|
| 23-Jan-02 | P strategy mtg re compliance issues | 2.5 | \$512.50 |
| 6-Mar-02 | T C ["telephone conference"], FL SJS, and CEC re: feed petition | 0.2 | \$41.00 |
| 20-Jun-02 | Conf call re: active treatment policy | 0.7 | \$143.50 |
| 31-Jul-02 | Pre-court meeting | 0.5 | \$102.50 |
| | Post court meeting on hearing of 1st Circuit | 1.1 | \$225.50 |
| | Grand Totals | 19.8 | \$4,059.00 |

EXHIBIT B

This worksheet analyzes the hours charged by plaintiffs' attorneys and their support staffs relative to their work on the post trial brief. For the purposes of this worksheet, "brief", "memo", and "supplemental memo" are presumed to be synonymous. This worksheet analyzes the research, drafting and revision of the post trial brief performed after the November 2001 trial.

| | English | Task | Bel | Polish |
|-----------|---------|------|------|--------|
| 1-Nov-01 | | | | |
| 2-Nov-01 | | | | |
| 3-Nov-01 | | | | |
| 4-Nov-01 | | | | |
| 5-Nov-01 | | | | |
| 6-Nov-01 | | | | |
| 7-Nov-01 | | | | |
| 8-Nov-01 | | | | |
| 9-Nov-01 | | | | |
| 10-Nov-01 | | | | |
| 11-Nov-01 | | | | |
| 12-Nov-01 | | | | |
| 13-Nov-01 | | | | |
| 14-Nov-01 | | | | |
| 15-Nov-01 | | | | |
| 16-Nov-01 | 0.4 | | 0.2 | |
| 17-Nov-01 | | | | |
| 18-Nov-01 | | | | |
| 19-Nov-01 | 1.6 | 1.5 | 1.2 | 6.8 |
| 20-Nov-01 | 0.5 | | | 2.2 |
| 21-Nov-01 | 6.3 | 1.4 | 8 | 1.7 |
| 22-Nov-01 | | | | |
| 23-Nov-01 | 8.3 | | 8 | |
| 24-Nov-01 | 3.1 | 1.4 | 4.5 | |
| 25-Nov-01 | 4.5 | 3.3 | | |
| 26-Nov-01 | 2.1 | | | 5 |
| 27-Nov | 0.7 | | 0.5 | 6.4 |
| 28-Nov-01 | 0.5 | 4.4 | 2 | 3.5 |
| 29-Nov-01 | 0.3 | 1.9 | 2.25 | 1.4 |
| 30-Nov-01 | | 7 | 1.25 | |
| 1-Dec-01 | | | | |
| 2-Dec-01 | | 3.2 | | |
| 3-Dec-01 | | | | 1.2 |
| 4-Dec-01 | | 6.6 | 0.6 | |

EXHIBIT C

This worksheet analyzes the hours charged by plaintiffs' attorneys and their support staffs relative to the drafting and revision of the "Findings of Fact" portion of their post-trial brief. This worksheet computes the total number of hours each member of the plaintiffs' legal team devoted to the "Findings of Fact" and multiplies this figure by their respective hourly rate.

| | Mon | Tue | Wed | Thurs | Fri | Sat | Sun | Total | Hourly Rate | Total Hours |
|-----------|-----|-----|-----|-------|-----|-----|-----|-------|-------------|-------------|
| 1-Nov-01 | | | | | | | | | | |
| 2-Nov-01 | | | | | | | | | | |
| 3-Nov-01 | | | | | | | | | | |
| 4-Nov-01 | | | | | | | | | | |
| 5-Nov-01 | | | | | | | | | | |
| 6-Nov-01 | | | | | | | | | | |
| 7-Nov-01 | | | | | | | | | | |
| 8-Nov-01 | | | | | | | | | | |
| 9-Nov-01 | | | | | | | | | | |
| 10-Nov-01 | | | | | | | | | | |
| 11-Nov-01 | | | | | | | | | | |
| 12-Nov-01 | | | | | | | | | | |
| 13-Nov-01 | | | | | | | | | | |
| 14-Nov-01 | | | 1.3 | | | | | | | |
| 15-Nov-01 | | 1.2 | | | | | | | | |
| 16-Nov-01 | | 0.8 | 0.3 | | | | | | | |
| 17-Nov-01 | | | | | | | | | | |
| 18-Nov-01 | | | | | | | | | | |
| 19-Nov-01 | 2.6 | 1.3 | 2.4 | | | | | | | 2 |
| 20-Nov-01 | 1.1 | 3.2 | 2.9 | 1 | | | | | | 0.3 |
| 21-Nov-01 | | 0.9 | 5.2 | | | | | | | |
| 22-Nov-01 | | | | | | | | | | |
| 23-Nov-01 | | | | | | | | | | |
| 24-Nov-01 | | | | | | | | | | |
| 25-Nov-01 | | | | | | | | | | |
| 26-Nov-01 | | | 5.1 | | | | | | | |
| 27-Nov | | 2 | 4.4 | 1 | | | | | | |
| 28-Nov-01 | 1.2 | | 5.5 | 6 | | | | | | |
| 29-Nov-01 | | 0.7 | 4.2 | | | | | | | 2.8 |
| 30-Nov-01 | | 0.5 | 6.8 | 3.6 | | | | | | 4.6 |
| 1-Dec-01 | | | | | | | | | | 8.3 |
| 2-Dec-01 | | | | | | | | | | |
| 3-Dec-01 | | 0.7 | 4 | 7.5 | 3 | | | | | |
| 4-Dec-01 | | 0.6 | 6.7 | | 1.5 | | | | | |
| 5-Dec-01 | | 3 | 3.1 | 5.7 | | | | | | 0.3 |
| 6-Dec-01 | | 1.4 | 5.2 | | | | | | | |
| 7-Dec-01 | 1.2 | | 5.1 | 0.75 | 3.2 | | | | | 0.4 |

[illegible]

EXHIBIT D

BELIN

This worksheet analyzes the work performed by Richard Belin relative to "reviewing and revising" various materials with a view towards identifying duplicative work. For entries representing "block billing", I assigned fractions that reflect the total hours spent on the tasks described based on my best estimation. The hours are totaled and multiplied by Mr. Belin's compromised billing rate to generate a "lodestar." This analysis does not include a bulk of Mr. Belin's reported hearing preparation, attendance at hearing, travel time, and includes a very limited number of telephone conferences.

Compromised Hourly Rate:
\$257.50

| Date | Entry | Billing | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|----------|
| | | Hours | Amount |
| 1-Jun-01 | Memorandum and e-mail regarding scheduling conference issues | 0.2 | \$51.50 |
| 4-Jun-01 | E-mails regarding specialized services | 0.2 | \$51.50 |
| 5-Jun-01 | Reviewing e-mails re: York and conference call | 0.1 | \$25.75 |
| 6-Jun-01 | Yes Reviewing draft response to motion re: York | 0.5 | \$128.75 |
| 11-Jun-01 | Yes Attention to additional staffing | 0.4 | \$103.00 |
| 12-Jun-01 | E-mails with Costanzo | 0.1 | \$25.75 |
| 18-Jun-01 | Memorandum from Engel | 0.1 | \$25.75 |
| 3-Jul-01 | Reviewing residential placement documents | 0.2 | \$51.50 |
| 11-Jul-01 | Reviewing supplemental brief on fees and e-mail to Schwartz re: same | 0.3 | \$77.25 |
| 17-Jul-01 | Reviewing opposition to motion for leave; Meacham letter to Costanzo; reviewing draft motion for further relief re: specialized services | 0.3 | \$77.25 |
| 24-Jul-01 | Yes Reviewing court order on fees and other orders | 0.2 | \$51.50 |
| 12-Aug-01 | Reviewing and responding to correspondence; reviewing court filing re: expert issues and motion for relief | 0.3 | \$77.25 |
| 13-Aug-01 | Reviewing memoranda and correspondence with AG; preparation for and participate in telephone conference with Schwartz et al re: expert and discovery issues and hearing preparation | 2.3 | \$592.25 |
| 15-Aug-01 | Yes Reviewing discovery drafts | 0.2 | \$51.50 |
| 20-Aug-01 | Yes Reviewing, revising document responses | 0.3 | \$77.25 |

| Date | Billing | Entry | Billing | | |
|-----------|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|--------------|----------|
| | | | Hours | Appportioned | Amount |
| 21-Aug-01 | | Reviewing, revising interrogatory responses and responses to document requests and telephone conference with Engle re: same; telephone call from Costanzo | 1.1 | | \$283.25 |
| 27-Aug-01 | | With Hatrick | 0.2 | | \$51.50 |
| 29-Aug-01 | | Letter from Wechsler | 0.1 | | \$25.75 |
| 31-Aug-01 | | Reviewing defendants' responses to interrogatories and document requests | 0.5 | | \$128.75 |
| 7-Sep-01 | | Extensive review and revision of motion to preclude and supporting brief; reviewing, revising Schedule A's to DMR and DMR; e-mails to Schwartz; further review and revision of brief | 2.1 | | \$540.75 |
| 10-Sep-01 | | Reviewing, revising motion; reviewing deficiency letter re: int's and doc requests | 0.8 | | \$206.00 |
| 12-Sep-01 | | Letter from Wechsler re experts; with Hatrick re: emergency motion | 0.4 | | \$103.00 |
| 13-Sep-01 | | Reviewing Daubert materials; e-mails with Schwartz and Hatrick; reviewing, revising motion papers; Wechsler letter and objections | 1.2 | | \$309.00 |
| 17-Sep-01 | | Emails re Hatrick re depositions and motions; reviewing Neiman order on fees, reviewing Defendant's opposition to emergency motion; meeting with Hatrick re: discovery issues and motions; message to Wechsler re: discovery and need to confer | 1.1 | | \$283.25 |
| 18-Sep-01 | | Reviewing correspondence | 0.1 | | \$25.75 |
| 20-Sep-01 | Yes | Reviewing opposition to motion to preclude | 0.27 | 1/4 | \$69.53 |
| 24-Sep-01 | | Memorandum from Costanzo; emails with Costanzo and Schwartz memo to Costanzo and Schwartz with Hatrick re: discovery motions; reviewing, revising motion to compel further discovery responses and telephone conference with Hatrick re: same; reviewing, revising Belin affidavit; further review and revision of brief on motion to compel and Belin affidavit | 2 | | \$515.00 |

| Date | Billing | Entry | Billing | | |
|-----------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-----------|----------|
| | | | Hours | Appointed | Amount |
| 25-Sep-01 | Yes | Reviewing, revising Belin and McLaughlin affidavits; with Hatrick | 2.3 | 2/3 | \$592.25 |
| 26-Sep-01 | | Reviewing, revising serving [sic] motion to compel and memo in support, with McLaughlin, reviewing, revising Costanzo letter re expert issues; emails re: expert disclosure issues; reviewing correspondence | 0.9 | | \$231.75 |
| 27-Sep-01 | Yes | Reviewing correspondence; reviewing opposition to motion to compel; reviewing York and Costanzo correspondence; email re: York letter. Reviewing Metrowest document | 1.4 | 8/9 | \$360.50 |
| 29-Sep-01 | | Emails re: discovery issues; letter from Meacham re: discovery | 0.3 | | \$77.25 |
| 30-Sep-01 | | Reviewing Deposition transcripts | 1.3 | | \$334.75 |
| | | Reviewing Deposition transcripts | 1.6 | | \$412.00 |
| 1-Oct-01 | Yes | Reviewing key documents; reviewing York motion to continue reviewing, revising motion to compel; memo in support | 0.95 | 1/2 | \$244.63 |
| 3-Oct-01 | Yes | Reviewing, revising letter to York; reviewing, revising brief on motion to compel discovery responses; with Hatrick | 0.65 | 1/2 | \$167.38 |
| 4-Oct-01 | | Reviewing, revising motion to compel; further edits | 0.5 | | \$128.75 |
| 5-Oct-01 | | Reviewing court notice; email from Boundy | 0.2 | | \$51.50 |
| 8-Oct-01 | | Email from Schwartz; telephone call to Hatrick; reviewing expert reports | 2.3 | | \$592.25 |
| 9-Oct-01 | | With Hatrick re: motion to compel; emails with Schwartz; reviewing, revising motion to compel; reviewing expert reports; telephone conference with Schwartz et al | 1.4 | | \$360.50 |
| 10-Oct-01 | | Reviewing witness list and expert addendum; reviewing, revising expert subpoenas | 0.4 | | \$103.00 |
| 11-Oct-01 | | Emails with Hatrick; reviewing further expert reports | 1.5 | | \$386.25 |
| 12-Oct-01 | | Reviewing, revising draft motion to compel and brief re: DMA documents | 0.4 | | \$103.00 |

| Date | Billing | Entry | Billing | | |
|-----------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|-------------|----------|
| | | | Hours | Apportioned | Amount |
| 15-Oct-01 | | Emails w/ Laski; telephone call to Engel; telephone conference with Schwartz et al; reviewing defendant's opposition to motion to compel | 1.4 | | \$360.50 |
| 16-Oct-01 | | Reviewing expert reports; telephone conf. w/ Schwartz et al; with McLaughlin | 2.1 | | \$540.75 |
| 17-Oct-01 | | Reviewing York discovery letter and email with Schwartz re: response to same; meeting with Hatrick; telephone conference with Engel re: outline for motion in limine; emails with Schwartz re expert issues; reviewing correspondence; reports and motion memorandum to Costanzo | 1 | | \$257.50 |
| 18-Oct-01 | | Reviewing Court rulings | 0.1 | | \$25.75 |
| 19-Oct-01 | Yes | Reviewing Riley deposition transcript | 0.1 | 1/3 | \$25.75 |
| 21-Oct-01 | | Reviewing court rulings; reviewing, revising pretrial memo; further review and revision of brief | 1 | | \$257.50 |
| 22-Oct-01 | Yes | Reviewing correspondence; reviewing defendant's Opposition re: motion to compel DMR; further review and revision of pretrial brief | 2.4 | 3/5 | \$618.00 |
| 23-Oct-01 | Yes | Reviewing court order; reviewing, revising motion in limine | 1.02 | 3/5 | \$262.65 |
| 24-Oct-01 | Yes | Reviewing DMR documents | 0.5 | 2/7 | \$128.75 |
| 26-Oct-01 | Yes | Reviewing deposition transcript in preparation for hearing | 0.65 | 1/2 | \$167.38 |
| 29-Oct-01 | Yes | Reviewing Daubert motions; reviewing documents; reviewing, revising motion to compel; with Hatrick; hearing preparation | 1.5 | 1/2 | \$386.25 |
| 30-Oct-01 | Yes | Reviewing correspondence and court filings; reviewing supplemental interrogatory responses; reviewing defendant's pretrial memo; hearing preparation | 0.85 | 5/7 | \$218.88 |
| 31-Oct-01 | Yes | Reviewing, revising motion in limine; reviewing opposition to motion to compel | 1.05 | 2/3 | \$270.38 |
| 1-Nov-01 | Yes | With McLaughlin; emails with Schwartz | 0.95 | 1/4 | \$244.63 |
| 8-Nov-01 | | Analysis of findings and rulings; meeting w/ Hatrick | 0.3 | | \$77.25 |
| 9-Nov-01 | | | 0.9 | | \$231.75 |

| Date | Billing | Entry | Billing | | |
|-----------|---------|----------------------------------------------------------------------------------------------------------------|---------|-------------|----------|
| | | | Hours | Apportioned | Amount |
| 6-Nov-01 | | Reviewing outlines for findings of fact and post trial brief and emails re: same | 0.4 | | \$103.00 |
| 19-Nov-01 | Yes | Reviewing, revising new outlines; conf w/ Hatrick re: findings & rulings | 1.3 | 2/3 | \$334.75 |
| 1-Dec-01 | | Reviewing, revising post-hearing brief | 1 | | \$257.50 |
| 3-Dec-01 | | Reviewing, revising brief; fax to Schwartz; meeting with Hatrick re: findings | 0.6 | | \$154.50 |
| 11-Dec-01 | | Reviewing, revising findings | 0.7 | | \$180.25 |
| 19-Dec-01 | | Reviewing, revising proposed findings of fact | 1 | | \$257.50 |
| 27-Dec-01 | | Reviewing post hearing brief | 0.6 | | \$154.50 |
| 31-Dec-01 | | Reviewing defendant's post hearing submittals | 1 | | \$257.50 |
| 3-Jan-02 | | Reviewing defendant's post trial submittals; fax and emails with Schwartz re: fees and post trial submittals | 1.1 | | \$283.25 |
| 9-Jan-02 | | Reviewing defendants' supplementary memorandum | 0.4 | | \$103.00 |
| 28-Jan-02 | | Attention to CPR time charges | 0.2 | | \$51.50 |
| 18-Mar-02 | | Reviewing, revising discovery responses and emails re: same | 0.2 | | \$51.50 |
| 6-May-02 | | Reviewing court decisions and emails re: same | 0.6 | | \$154.50 |
| 16-May-02 | | Preparation for and participate in conference call w/ S. Schwartz et al re: next steps; emails with McLaughlin | 1.2 | | \$309.00 |
| 15-Jul-02 | | Reviewing First Circuit Notice | 0.1 | | \$25.75 |
| 17-Jul-02 | | Reviewing Neiman Order | 0.1 | | \$25.75 |
| 18-Jul-02 | | **Reviewing, revising E.Chen research memo | 0.3 | | \$77.25 |
| 19-Jul-02 | | **Further reviewing, revising legal research memo | 0.2 | | \$51.50 |
| 25-Jul-02 | | **Reviewing C. Powell and D. Cole memoranda | 0.7 | | \$180.25 |

| Date | Filing | Entry | Hours | Appportioned | Amount |
|--------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------|-------|--------------|-------------|
| 29-Jul-02 | | Reviewing defendants' filing re: active treatment policy | 0.2 | | \$51.50 |
| 9-Aug-02 | | **Reviewing Favelukes memorandum re: Gonzaga legal research issues | 0.6 | | \$154.50 |
| 16-Aug-02 | Yes | Reviewing time records and prior affidavits and drafting revising affidavit with support of fee application; reviewing court order re active treatment | 1.7 | 2/3 | \$437.75 |
| 22-Aug-02 | | Reviewing defendant's brief; further revisions to fee affidavit | 0.6 | | \$154.50 |
| 13-Sep-02 | | Reviewing memorandum on jurisdictional issues | 0.7 | | \$180.25 |
| 10-Oct-02 | | Reviewing defendant's opposition to fee application | 0.2 | | \$51.50 |
| 29-Oct-02 | | Reviewing reply brief ie, attorneys' fees | 0.5 | | \$128.75 |
| Grand Totals | | | 63.69 | | \$16,400.18 |

** I believe this item involves reviewing summer associate work.

EXHIBIT E

| DATE | BLOCK | ENTRY | TIME BILLED | COMMENTS | \$ |
|---------------------------|---------|-------------------------------------|----------------|----------|------------|
| ENGEL | | | | | |
| COMPROMISED RATE \$205.00 | | | | | |
| 11/28/01 | BILLING | | | | |
| 11/29/01 | | Review & edit post-trial memo | 2.25 | | |
| | | Draft comments re memo | 1.25 | | |
| | | review & edit CEC section | | | |
| | | of post-trial | | | |
| 1/2/02 | | Read Defs' brief and proposed | 2 | | |
| | | findings | | | |
| 5/7/02 | | Read court decision | 1 | | |
| 8/23/02 | | Read AG brief | 1 | | |
| 10/28/02 | | Review draft of reply brief on fees | 1 | | |
| | | | | | |
| | | | 43.7 | | |
| | | | | | |
| | | | | | \$8,958.50 |

EXHIBIT F

Expert Tours

This worksheet analyzes the billable time reported by the attorneys and their support staff relative to instances where two legal staffers participate in "expert tours." The billable hours are totaled and multiplied by the applicable hourly rate to generate a "lodestar" for each person. These figures are then added to provide a **grand total**. This analysis does not cover work performed in preparation of the expert tours.

| Key |
|----------------------------|
| Steven Schwarz = |
| SJS |
| Cathy Costanzo = |
| CEC |
| Marcia Boundy = |
| MEB |
| Matthew Engel = |
| Engel |
| Frank Laski = Laski |

| Attorney | Description | Hours | Rate | Total |
|----------|--------------------------------------------------------------------------------------------------------|-------|----------|-------------------|
| SJS | Visit classmates (Raybo, O'Connor, and Donovan) at nursing facilities and day hab programs with expert | 9.5 | \$275.00 | \$2,612.50 |
| CEC | Tours of nursing homes and specialized service settings w/ experts | 10 | \$205.00 | \$2,050.00 |
| MEB | Nursing home/day hab tours | 8 | \$75.00 | \$600.00 |
| | Total | | | \$5,262.50 |

| Attorney | Description | Hours | Rate | Total |
|----------|-------------|-------|------|-------|
| Aug-01 | | | | |

| | | | | |
|--------------|--------------------------------------------------------------------------------------------|----|----------|-------------------|
| SJS Engel | Review specialized services and nursing facility programs for classmembers Black and Hayes | 8 | \$275.00 | \$2,200.00 |
| | Roland expert tours | 12 | \$205.00 | \$2,460.00 |
| | Total | | | \$4,660.00 |

| | | | | |
|-------------------------------------|------------------------------------------------------------------|-----|----------|-------------------|
| 22-Aug-01 Attorney/Staff | | | | |
| SJS Engel | Review specialized services for classmember Gary Harlow | 4.5 | \$275.00 | \$1,237.50 |
| | Roland expert tours | 10 | \$205.00 | \$2,050.00 |
| | Tours of nursing homes, day habs; travel to and from North Shore | 8 | \$75.00 | \$600.00 |
| MEB | | | | |
| | Total | | | \$3,887.50 |

| | | | | |
|------------------------------------|-------------------------------------------------------------|----|----------|-------------------|
| 3-Aug-01 Attorney/Staff | | | | |
| SJS Engel | Review specialized services for Herb Stincel and Ruth Clark | 9 | \$275.00 | \$2,475.00 |
| | Roland expert tours | 10 | \$205.00 | \$2,050.00 |
| | Total | | | \$4,525.00 |

| | | | | |
|-------------------------------------|----------------------------|---|----------|-------------------|
| 22-Aug-01 Attorney/Staff | | | | |
| CEC Engel | Expert tour of E. Affenito | 7 | \$205.00 | \$1,435.00 |
| | Roland expert tours | 4 | \$205.00 | \$820.00 |
| | Total | | | \$2,255.00 |

| | | | | |
|-------------------------------------|-------------------------------------------------------------------------------------------------------|----|----------|------------|
| 25-Aug-01 Attorney/Staff | | | | |
| Laski | Tour nursing home, meet clients and guardians and providers S.S. collaborative Wakefield, (E.S.), May | 10 | \$275.00 | \$2,750.00 |
| | | | | |

| | | | | |
|--------------|-----------------------------|-----|----------|-------------------|
| Engel | Rolland expert tours | 9 | \$205.00 | \$1,845.00 |
| McLaughlin | Tour facilities with expert | 8.5 | \$100.00 | \$850.00 |
| Total | | | | \$5,445.00 |

| | | | | | |
|--------------------|-----------------------|----------------------------------------------------------------------------------------------------|--------------|-------------|--------------------|
| 23-Aug-01 | Attorney/Staff | Description | Hours | Rate | Total |
| CEC | | Expert tours with Elizabeth Jones - Gammel, Duggan, Middleton | 13 | \$205.00 | \$2,665.00 |
| Laski | | Meeting visit to nursing home and program with Lynn (Sunbridge and D.P. (goodwill) Salem with L.R. | 7 | \$275.00 | \$1,925.00 |
| Total | | | | | \$4,590.00 |
| GRAND TOTAL | | | | | \$30,625.00 |

EXHIBIT G

HATRICK -- SUPERVISING SUMMER ASSOCIATION

COMPROMISED RATES \$120.00

| DATE | BLOCK BILLING | ENTRY | TIME BILLED | COMMENTS | \$ |
|---------|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------|----------|----|
| 6/4/02 | | Spoke with S. Schwartz regarding summer associate projects in preparation for an appeal | 0.4 | | |
| 6/7/02 | | Prepared materials for and submitted summer associate research requests | 1.5 | | |
| 6/17/02 | | Followed up with N. Austin regarding PASARR regulations assignment | 0.4 | | |
| 6/18/02 | <input checked="" type="checkbox"/> | Finished gathering background materials for summer associate assignments; followed-up with C. Powell on NHRA assignment | 0.9 | 1/2 | |
| 6/19/02 | <input checked="" type="checkbox"/> | Received Oct. 2001 memorandum in support from P. Long and forwarded to C. Powell & N. Austin (to complete case history packet) | 0.3 | 1/2 | |
| 6/20/02 | <input checked="" type="checkbox"/> | Met with N. Austin regarding PASARR regulations assignment; followed-up with research help | 0.65 | 1/2 | |
| 6/24/02 | | Met with C. Powell regarding research assignments on the nursing home amendments | 0.8 | | |
| 6/25/02 | <input checked="" type="checkbox"/> | Drafted and submitted summer associate project on post-Sandoval case | 1 | 1/2 | |
| 6/26/02 | | Met with E. Chen to discuss Sandoval summer associate assignments | 0.2 | | |

| | | | | |
|---------|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-----|
| 7/2/02 | <input checked="" type="checkbox"/> | Followed up with summer associates ab. their assignments | 1 | 1/2 |
| 7/3/02 | | Updated S. Schwartz regarding summer associate projects; touched base with C. Powell, N. Austin and E. Chen regarding progress on their assignments, trouble shooting, etc. | 3 | |
| 7/8/02 | | Met with D. Cole regarding "then existing facts and law" | 0.2 | |
| 7/9/02 | | summer associate assignment Reviewed C. Powell's analysis of the legislative history of "active treatment" and "specialized services" in the NHRA and subsequent amendments; followed up with C. Powell; spoke with E. Chen re Sandoval assignment; reviewed N. Austin's rough draft of CFR citation history; edited E. Chen's rough draft | 5.5 | |
| 7/10/02 | | Continued editing E. Chen's rough draft of his analysis of Sandoval and progeny and Sandoval's redaction and application to Rolland discussed edits & further research with E. Chen | 1.3 | |
| 7/11/02 | | Discussed PASARR regulations research project with N. Austin; received update on Sandoval project from E. Chen; discussed all summer associate projects and general case update with Beli | 1.4 | |
| 7/12/02 | <input checked="" type="checkbox"/> | Reviewed C. Powell's rough draft of legislative history of NHRAs and summary memorandum; discussed project details with E. Chen | 1.75 | 1/2 |

| | | | |
|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-----|
| 7/15/02 | & N. Austin Reviewed draft of N. Austin's PASARR regs. Research project; reviewed and edited C. Powell's NHRA legislative history project; forwarded final copies to R. Belin & S. Schwartz | 4.2 | |
| 7/16/02 | Edited E. Chen's second draft of Sandoval research project; met with D. Cole to receive progress report on "then existing facts & law" project. Spoke with S. Schwartz about research projects and schedule for writing appeals brief | 4.3 | |
| 7/17/02 | Edited N. Austin's project on PASARR regs; followed up with C. Powell about extent of his legislative history research; drafted summer associate assignment for Gonzaga research; drafted summer associate assignment for 1990-2002 legislative history research; forwarded assignments and finished projects to S. Schwartz; reviewed C. Powell's final draft | 5.6 | |
| 7/18/02 | Edited E. Chen's final draft of Sandoval research project | 0.3 | |
| 7/19/02 | Edited E. Chen's Sandoval research project | 0.95 | 1/2 |
| 7/22/03 | Edited E. Chen's final draft of the Sandoval assignment; filled out <u>evaluation and reviewed with E. Chen</u> | 1 | |
| 7/24/02 | Renewed N. Austin's PASARR regs project <u>and shared review</u> | | |

| | | | |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------|
| 7/25/02 | with him. Met with S. Faveliki about Gonzaga research project; emailed summer associate projects to S. Schwartz Reviewed D. Cole's final draft on "their existing law and facts" research and followed up with D. Cole | 0.5 | |
| 8/1/02 | Followed up with N. Austin about breadth of research | 0.6 | 1/3 |
| 8/5/02 | Touched base with S. Favelukes about Gonzaga research | 0.2 | |
| 8/8/02 | Received final draft of Gonzaga research from S. Favelukes | 0.2 | 1/2 |
| 8/9/02 | Reviewed S. Favelukes' finished draft of Gonzaga research project; reported to R. Belin on same; reviewed NHRA for non-cited support | 1.3 | |
| | | | 40.45 X \$120 (compromised rate) |
| | | | Total \$4,854 |

EXHIBIT H

Roland Excessive Fees Project
Marcia Boundy
Administrative Functions

This worksheet analyzes the administrative work performed by Marcia Boundy. For the purposes of this worksheet, administrative work includes typing, faxing, photocopying ("Xeroxing"), scheduling, filing, making travel arrangements, printing and/or downloading materials, and other traditionally administrative functions. The worksheet calculates the total number of administrative hours charged and multiplies that figure by Ms. Boundy's hourly rate of \$75.

| | | Time Spent | Notes |
|-----------|------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 2-Jan-01 | Filing, Xeroxing incoming records; sample2 updated records | 6.3 | |
| 3-Jan-01 | Read, Xerox, assemble, sort defendants' documents, re: specialized services checklist for majority of clients in the sample1 | 1.6 | |
| | Fax release authorization forms to social workers for client signatures | 0.2 | |
| | Review clients records, Xerox and file .. Incoming records sample1 | 2.35 | |
| 4-Jan-01 | Review client records; Xerox and file incoming records for sample1 classmates re: day hab services | 1.15 | |
| 5-Jan-01 | Fax release form to nursing home for signature of class member | 0.1 | |
| 9-Jan-01 | Filing, Xeroxing records of class member from sample1 | 0.5 | |
| | Filing pre-existing records, reorganizing files to make room for incoming records from sample2 | 1 | |
| 11-Jan-01 | Fax classmember's authorization for release of records to nursing home | 0.1 | |

| | Time Spent | Notes |
|-----------|------------|-------------------------------------------------------------------------------------------------------------------------|
| 11-Jan-01 | 1 | Filing, Xeroxing incoming records re: sample1 and sample2 class members |
| 12-Jan-01 | 3.3 | Filing, Xeroxing records incoming sample1 and sample2 class members |
| 17-Jan-01 | 1 | Review client recors: continue to Xerox, file and write up narratives on sample class members based on incoming records |
| 22-Jan-01 | 2 | Xerox affidavits, defendant's specialized services checklist; write cover letter and forward all above to experts |
| 23-Jan-01 | 0.2 | Fax records requests with proper authorizations to nursing facilities |
| | 1.2 | Filing, Xeroxing nursing facility records |
| 24-Jan-01 | 4 | Filing, Xeroxing records of nursing home residents |
| 25-Jan-01 | 0.1 | Drop off medical/nursing home records at Copy Cat |
| | 0.7 | Fax requests, authorizations to three nursing facilities |
| | 2.6 | Xeroxing, filing incoming records from sample class members |
| 31-Jan-01 | 0.7 | Filing, and Xeroxing classmembers' records forwarded by DMR service coordinator |
| 9-Feb-01 | 0.8 | Filing, Xeroxing DMR service coordinator's records for files, expert, etc. |
| 12-Feb-01 | 0.5 | Filing and Xeroxing nursing home records for expert, staff |
| 14-Feb-01 | 0.2 | Fax record request and release to New Bedford nursing home |
| 21-Feb-01 | 2.2 | Filing, Xeroxing nursing home records for three classmembers... |
| 26-Feb-01 | 1.8 | Sorting, Xeroxing and filing incoming records of classmember(s) |

| | | Time Spent | Notes |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 1-Mar-01 | Filing, Xeroxing incoming medical records, nursing facility records for members in both original sample and sample2 | 1.3 | |
| 7-Mar-01 | Draft letter to nursing home re: (?) Make copies of classmember's release authorization and file; enclose same in letter | 0.3 | |
| | Review, Xerox and file client records received via mail from DMR Brockton Office | 0.35 | |
| 8-Mar-01 | Review client records, specifically, the semi-annual report for July thru December; culled through documents, Xeroxed pertinent pages for sample classmembers | 1.25 | |
| 12-Mar-01 | Filing, organizing individual records of all classmembers listed in defendants' semi-annual report; cull and Xerox records of sample1 and sample2 individuals and file accordingly. | 2.3 | |
| 14-Mar-01 | Review client records; updated Pasars received. Read, Xeroxed and filed | 0.3 | |
| 15-Mar-01 | Filing and Xeroxing records received from nursing homes | 0.5 | |
| 21-Mar-01 | Fax mem to co-counsel | 0.2 | |
| 29-Mar-01 | Fax court decision to various agencies, people (NAPAS, ARC, etc.) | 0.6 | |
| 9-Apr-01 | Review classmembers' records, copy, file accordingly, designate those to be shipped out for copying | 1.3 | |
| | Delivery of sample2 classmembers to Copy Cat | 0.4 | |
| 10-Apr-01 | Review client records; sort, organize filing system for sample 2 classmembers | 1.5 | |
| | Review client records, copy 300 pages of newly-received records | 0.6 | |
| 12-Apr-01 | Review client records; deliver second batch to copy shop | 0.25 | |

| | | Time Spent | Notes |
|-----------|----------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 17-Apr-01 | Review sample 2 client records Xeroxed at area copy shop; assemble for attorneys, for experts; file originals etc | 1 | |
| 24-Apr-01 | Telephone to several nursing homes re: FY12 Pasarrs; fax releases to NH social workers | 0.3 | |
| 25-Apr-01 | Filing, copying incoming day hab records and Pasarrs | 0.9 | |
| 26-Apr-01 | Review client records, specifically faxed Pasarr from Greenery XCC; copy and file accordingly | 0.2 | |
| 27-Apr-01 | Review client records, Xerox and file records received during the week.... Copies for expert | 1.1 | |
| 30-Apr-01 | Fax to expert seeking availability dates for tours | 0.2 | |
| | Review client records, specifically, incoming Pasarrs; copy and file accordingly | 0.45 | |
| 1-May-01 | Filing, xeroxing incoming Pasarrs; additional day hab records | 1.2 | |
| 3-May-01 | Filing, xeroxing Pasarrs, day hab records | 0.5 | |
| 7-May-01 | Telephone call from expert re: possible tour sked. | 0.1 | |
| 8-May-01 | E-mail to Steven proposed sked of nursing home/day hab tours | 0.2 | |
| 10-May-01 | Copying, filing incoming Pasarrs; also day hab records; also, sorting files to be Xeroxed at shop; deliver files/records to shop | 2 | |
| | Telephone to experts re: possible tours, skeds | 0.3 | |
| 17-May-01 | Review client records, specifically, updated Pasarrs received in day's mail (sic); copy and file accordingly | 0.2 | |

| | | Time Spent | Notes |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 21-May-01 | Review correspondence and documents re: proposed tour schedules for experts to visit classmates at NF's and day habs; review maps, online directions for mileage, time etc | 1.4 | |
| | Fax 20 pages of information re: (?) w/ articles re: expert testimony to two experts | 0.5 | |
| 24-May-01 | Mail plaintiffs motion re: sked order to court; make copies, accordingly | 0.4 | |
| 31-May-01 | Research online, focusing on additional names re: active treatment; download materials, Xerox for counsel | 0.3 | |
| | Prepare labels for mass mailings to guardians and/or classmates | 0.8 | |
| 1-Jun-01 | Copy and file all requests for releases | 0.5 | |
| | Print downloaded material and fax to experts | 0.6 | |
| 4-Jun-01 | Review client records...set up files for tracking receipt of releases. Copy and file incoming releases | 0.35 | |
| 5-Jun-01 | Review client records, specifically, incoming release authorizations. Copy, catalogue, file | 0.25 | |
| 7-Jun-01 | Review client records, specifically incoming release authorizations: copy, catalogue, file. | 0.5 | |
| 11-Jun-01 | Fax memo to co-counsel, laying out scheduling order for discovery, motions, depositions, etc. | 0.2 | |
| | Fax Judge Neiman's decision re: spec. services to independent expert. | 0.5 | |
| | Telephone to office of independent expert to verify receipt of fax and inquire about telephone number of KGM associate in Tennessee. | 0.1 | |

| | | Time Spent | Notes |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 12-Jun-01 | Copy pertinent sections of expert witness reports, rebuttals, affidavits, motions from Johnson case in preparation for better understanding of Daubert in Rolland | 0.8 | |
| 13-Jun-01 | Label, assemble classmembers' files received from nursing homes, day hab provides and state agencies | 3 | |
| 14-Jun-01 | Review client records, specifically, incoming releases; copy, catalogue, file | 0.15 | |
| 15-Jun-01 | Continue drafting letters to nursing homes, day habs and service mnngs/case managers on behalf of classmembers from Summer of 2000 tour; assemble with release authorizations; mail | 0.3 | |
| 18-Jun-01 | Review client records, specifically releases received over the weekend, copy, catalogue and file. | 0.15 | |
| 19-Jun-01 | Telephone to experts re: scheduling of tours July 24-Aug 31. | 0.1 | |
| 21-Jun-01 | e-mail and replies, voice mail and notes: review Cathy's emailed synopsis (sic) HCFA telephone call (6/19); review voice mails from experts re: sked for summer tours. | 0.2 | |
| 27-Jun-01 | Fax records requests and release authorization on behalf of class member to DMR service coordinator | 0.2 | |
| | Telephone to third expert re: request for c.v.; possible tour dates | 0.1 | |
| | Review client records, deliver six files to Copy Cop | 0.5 | |
| | Telephone to expert re: scheduling tours; active treatment materials (left voice message) | 0.05 | |
| 3-Jul-01 | Fax listing of classmembers to B. Pillarcik; mail court schedule | 0.2 | |

| | | Time Spent | Notes |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Filing NH and DH records; setting up files, copies for experts, etc, etc. | 1.6 | |
| 5-Jul-01 | Filing and organizing (sic) office files | 1.25 | |
| 6-Jul-01 | Conference with attys (Cathy and Matthew) re: available dates for nursing home/day hab tours. | 0.5 | |
| | Telephone to expert B. Pilarcik re: dates of availability (sic) for tours; discussion of number of days needed to conduct tours; discussion of specific clients in caseload | 0.2 | |
| 9-Jul-01 | Review client records and assemble for each expert accordingly based on selected classmates; make additional copies received over the weekend and in Monday's mail... | 2.5 | |
| 10-Jul-01 | Review client records, copy as needed, incoming records | 0.7 | |
| | Start contacting 52 nursing home and day hab providers to draft a schedule for nursing home and day hab tours for 34 clients at 52 sites based on availability and respective schedules of three attys and three experts | 6.2 | |
| 12-Jul-01 | Conference with Cathy re: tours, experts, scheduling status | 0.5 | |
| 13-Jul-01 | Telephone to more providers/social workers/experts re: tour schedule | 6.5 | |
| | Additional telephone calls to nursing homes, day hab re: tour schedule... continue | 2.1 | |
| 16-Jul-01 | tweaking schedule | | |
| | E-mail to and from expert re: travel arrangements, transportation issues | 0.5 | |
| | Conference with Matthew re: schedule re: tours | 0.1 | |
| | Telephone to Linda in Newton CPR re: expert's travel, hotel reservations, etc. | 0.4 | |

| | | Time Spent | Notes |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 17-Jul-01 | Draft letter to experts re: tours of nursing homes, day hab sites; provide schedules | 1 | |
| 18-Jul-01 | Review client records, continue assembling for tours, continue Xeroxing and filing | 4.6 | |
| | Telephone and emails to experts re: schedules, tour dates, upcoming conference calls; also to determine what records should be forwarded for medical review. | 1.5 | |
| | E-mail to counsel re: schedules for tours | 0.5 | |
| 19-Jul-01 | Review client records, specifically incoming records for classmembers... Make copies for files and experts | 4 | |
| | Telephone conference call with experts to discuss court hearing, spec. services, active treatment, tours, etc. | | |
| 23-Jul-01 | Conference with Cathy re: sample, scheduling tours | 0.3 | |
| | Review client records... again, assembling for tours, checking on status of Pasarr dates, release authorizations | 1 | |
| 24-Jul-01 | Revise and edit tour schedule | 1.8 | |
| | Review client records and assemble for tours. | 2.7 | |
| 25-Jul-01 | Telephone calls to expert re: August tour date to be rescheduled (sic) | 0.2 | |
| | Review correspondence and documents re: active treatment as proposed by expert Rucker; download materials and copy and distribute | 0.3 | |
| | Revise and edit tour schedule | 1.2 | |

| | | Time Spent | Notes |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 26-Jul-01 | Review client records: continue assembling for tours.. Deliver to copy shops additional records for review by medical expert... Set up files for each atty with pertinent records (Pasarras, release authorizations, directions) | 3.4 | |
| | Research online getting direction for expert Rucker and respective attnys assigned (sic) to her tours.. Directions to and from hotel to nursing homes to day hab sites etc etc | 1 | |
| 27-Jul-01 | Review client records: continue assembling gathering Pasarras, release authorizations, directions for all attys and all experts | 3.5 | |
| | Review client records: Pick up records from copy shop; package and mail to Dr. Dubin | 0.5 | |
| 29-Jul-01 | Review client records: final push to prepare for tours: assembling, directions, providing each atty with a schedule of sites, tel. Numbers and personal contacts at each site. | 3 | |
| 31-Jul-01 | Xerox personal maps for each atty for each community to lessen reliance on Internet directions | 2.1 | |
| | Fax directions from Boston to nursing (sic) home/day hab site for Thursday's tours. | 0.2 | |
| 1-Aug-01 | Revise and edit tour schedule, copy additional maps, for Matthew and Steven | 1 | |
| | Filing: continue assembling files of August tours | 4.1 | |

| | | Time Spent | Notes |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 6-Aug-01 | Telephone to New Bedford nursing home and day provider re: Mendes and Murray to set up tours.... Discuss possible tour dates for expert Pilarcik; telephone calls to nursing homes and day hubs to reschedule expert Jones tours from August 13 to Aug. 22 and August 28 | 3.2 | |
| | Conference with Matthew re: availability for additional tours | 0.2 | |
| | Telephone, email to expert Pilarcik re: availability for additional tours | 0.2 | |
| | Telephone call from expert Jones re: accommodations, flight reservations etc | 0.2 | |
| | Review client records, tweak tour schedule as needed | 0.25 | |
| | E-mail from expert Rucker re: availability for additional tours in August | 0.1 | |
| | Filing; continue organizing boxes of files | 2.2 | |
| 7-Aug-01 | Telephone to Linda in Newton re: hotel reservations for expert Rucker | 0.1 | |
| | Telephone call from expert Jones re: need to change tour schedule; | 0.3 | |
| | Filing; continue organizing nursing | 4.9 | |
| 8-Aug-01 | E-mail from expert Pilarcik re: availability for additional tour | 0.1 | |
| | Review client records and assemble additional records to be forwarded to expert Rucker and expert Pilarcik; mail Rucker records | 1.25 | |
| | E-mail to Frank Laski re: availability for tours in August | 0.1 | |
| 9-Aug-01 | Telephone to nursing homes and day hubs to reschedule expert Jones' tours from the 21st to the 23rd of August; contact day hub outreach programs to advise of change in schedule | 3.4 | |

| | | Time Spent | Notes |
|-----------|------------------------------------------------------------------------------------------|------------|-------|
| | E-mail from Frank Laski confirming availability | 0.1 | |
| | Mail additional records to expert Pilarcik | 0.4 | |
| | Telephone call from expert Jones advising of need to change another tour date | 0.2 | |
| | Telephone to Steven to advise of latest scheduling snafu | 0.2 | |
| | E-mail to Cathy on vacation re: Jones scheduling issues | 0.2 | |
| | Telephone call from Steven change in xpert Jones schedule | 0.3 | |
| | E-mail to expert Rucker inquiring about additional dates of availability for tours | 0.3 | |
| 10-Aug-01 | Telephone conference call with Steven and Cathy to discuss alternative scheduling plays | 0.5 | |
| | Telephone call from Cathy, from expert Jones honing in on alternative date | 0.4 | |
| | Revise and edit tour schedule | 1.3 | |
| | Telephone to expert Jones advising of new schedule | 0.2 | |
| | Xerox Sheehan file | 0.5 | |
| 13-Aug-01 | Telephone to nursing homes, days hab re: tweaking new sked for expert Jones's classmates | 2.1 | |
| | Copy and mail additional records to expert Pilarcik | 0.5 | |
| | Revise and edit tour sked to accommodate different day hab scheduling | 1.7 | |
| 14-Aug-01 | Telephone to day hab to set up appts for sample2 (sic) tours | 1.2 | |
| | Revise and edit tour sked; set up tentative (sic) tour sked for august tour | 2.5 | |
| | Telephone to Joanne re: availability as tour guide next week | 0.2 | |

| | | Time Spent | Notes |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Research online, getting directions from one nursing home/day hab program to another.... Gettign direction and a sense of time involved for touring and travels | 1.9 | |
| | Conference with Pam re: Elizabeth Jones' sked, accommodations, travel rangments etc. | 0.2 | |
| 15-Aug-01 | Review client records; incomgin rcords re: Mosher, Wilmarth, Gordon, Miller, get Xeroxed and filed | 1.5 | |
| | Telephone call from day hab provider re: classmember's release authorization; sked tours | 0.1 | |
| | Fax release authorization of classssmember (sic) to day hab provider | 0.1 | |
| | Revise and edit tour skeds | 3 | |
| | Start organizing files for document production | 2 | |
| 17-Aug-01 | E-mail to Lyn, Frank, and Joanne shceudles for tours, including addresses so they can set up mtg times etc. | 0.5 | |
| | Fax to Joanne, Lyn and Frank materials for next week's tours | 0.5 | |
| | E-mail to Barbara Pilarcik re: Monday's tour in southeastern Mass | 0.3 | |
| | Telephone to Bpilarcik re: Monday's tours | 0.1 | |
| | Telephone conference call with Cathy to discuss next week's schedule of tours, status of discovery issues, etc | 0.25 | |
| | Finalize tour plans for Lyn and Barbara; get together records for transports | 1.3 | |
| 21-Aug-01 | Conference with Pam re: Frank and Joanne schedules | 0.3 | |
| | Conference with Cathy re: tours, documents, directions | 0.2 | |

| | | Time Spent | Notes |
|------------------|--------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Secure better directions if possible for Cathy and Elizabeth | 0.5 | |
| | Telephone to day hab provider re: address, directions | 0.4 | |
| | Conference with Matthew re: next day's tours... contacts | 0.3 | |
| | Xerox additional records and mail to expert Pilarcik | 0.5 | |
| | Write note to Lyn Rucker, advising her of status of tours .. Record availability | 0.4 | |
| | Revise and edit schedule for all parties for all tours | 1.6 | |
| | Revise and edit tour lists with contacts and addresses | 1.4 | |
| 22-Aug-01 | Filing, organizing records... | 7 | |
| | emails from Joanne re: next day's tours | 0.1 | |
| | e-mail to Joanne with set schedule ... explaining whereabouts of day habs, nursing homes | 0.4 | |
| 23-Aug-01 | Filing: continue assembling records for document production | 3.1 | |
| 24-Aug-01 | Filing: finish assembling records for document productions: organize four boxes of all classmember files and label accordingly | 5.5 | |
| | Xerox and mail to Lyn Rucker records received in today's mail from day habs | 0.5 | |
| 4-Sep-01 | Review correspondence and documents re: prayers for relief; Xerox and fax to experts; also email to experts | 0.3 | |
| | Gather most recent semi-annual report from the defendants for Xeroxing at Copy Cat | 0.1 | |
| | Pick up massive semi-annual report at copy shop for next day's meeting in Boston | 0.4 | |

| | | Time Spent | Notes |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 6-Sep-01 | Type experts' handwritten reports; assist temp typist in deciphering handwritten reports etc. | 3.5 | |
| | Forward additional med. Reports to experts | 0.4 | |
| 10-Sep-01 | Fax and email report to expert | 0.3 | |
| | Continue typing up sections of another expert's handwritten report | 1.8 | |
| 11-Sep-01 | Filing; arrange files for production, add files recently received; start organizing | 3.1 | |
| 12-Sep-01 | Fax summary to expert | 0.1 | |
| 17-Sep-01 | Filing records for various classmates | 1.5 | |
| | Finish typing handwritten notes from experts re: reports; also update c.v.'s to reflect additional information | 2.1 | |
| 18-Sep-01 | Prepare and help carry boxes of nursing home records to DMR as part of production | 0.4 | |
| 20-Sep-01 | Review correspondence and documents re: Pilarcik report. Type up handwritten report. | 2.9 | |
| | Review correspondence and documents re: Pilarcik report: type up faxed hand-written report; TT to review spellings; accuracy of transcription | 2 | |
| 21-Sep-01 | Compile reports w/ Pam; gather disclosure statements, c.v.'s for each expert, Xerox and prepare mailings.. Drop off at Fed Ex for defendants | 2.5 | |
| 24-Sep-01 | E-mail to Lyn Rucker re: availability, time schedule | 0.3 | |
| | Filing of records correspondence | 3.1 | |
| | Review and plot on map the geographic locations of each classmates' nursing homes for touring... | 1 | |
| 25-Sep-01 | Telephone to social workers at nursing homes re: additional site tours... | 2.3 | |
| 26-Sep-01 | Get directions, time table for tour | 2.3 | |

| | | Time Spent | Notes |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Conference with Cathy re: tours, records, depositions, time tables, schedules | 1.9 | |
| | E-mail to Lyn Rucker, with site tour info, hotel arrangements, deposition prep schedule, transportation arrangements etc. | 0.4 | |
| 27-Sep-01 | Filing, Xeroxing of new client records; delivering to and from copy shop | 0.8 | |
| | Revise and edit tour schedule | 0.4 | |
| 28-Sep-01 | Pick up Xeroxed records at copy shop | 0.5 | |
| | Revise client records and finalize tour details for Cathy and Lyn Rucker. Get directions, change times to reflect classmembers; changing schedules and /or moves | 1 | |
| | Contact travel agent and hotel and transportation shuttle and set up arrangements for Liz Jones. | 0.5 | |
| 2-Oct-01 | Filing, organizing new files of additional individuals added to the sample for tours | 1.5 | |
| 3-Oct-01 | Telephone call from Cathy re: changing tour schedule, re: connecting w/ Cathy Todd about releases for classmembers | 0.1 | |
| | Telephone to nursing homes social workers to change schedule | 0.4 | |
| | Accept delivery of our records from DMR; help guy carry them in | 0.5 | |
| | Xerox indices of DMA production for co-counsel | 0.3 | |
| | Prepare and fax release of classmember to day employment center | 0.2 | |
| | Telephone to new nursing home to set up appt. for Cathy and Lyn; get directions | 0.4 | |
| | Fax directions, contacts etc. to Newton office for Cathy and Lyn | 0.2 | |
| 4-Oct-01 | Review client records, update tour lists, update Rolland sample list | 0.2 | |

| | | Time Spent | Notes |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Gather exhibits for motion: get prodouction docs. Xerox all 32-plus checklists; convert Steve's affidavit from Word into Corel; assemble | 2 | |
| | Fax Kristi copies of earlier checklists for motoin and memo; receive Joassn'e fax of Oliveira affidavit for motion | 1.2 | |
| | Telephone from Cathy re: changes in NH tours, directions, discussion re: motion, memo, exhibits | 0.1 | |
| 5-Oct-01 | Xerox motion, memo, exhibits etc and forward via FedEx to York and Wechsler | 3.5 | |
| | FedEx E. Jones tickets to Maryland for upcoming flight for deposition | 0.5 | |
| | Organize files, schlep experts' boses (sic) of files to lower level | 0.7 | |
| 12-Oct-01 | Review client records, extract and Xerox all June 15, 2001 letters to DMR services coordinators/Umass case mgrs re: record requests | 1 | |
| 15-Oct-01 | Finish drafting letters to Rucker interviewees, address envelopes and mail | 2.25 | |
| 19-Oct-01 | Xerox Pasarrs for all 45 in sample class | 2.2 | |
| 31-Oct-01 | Purchase mat board, pushpins, misc. supplies for exhibit for trial | 0.5 | |
| 1-Nov-01 | Drop off records at copy shop in preparation for trial | 0.5 | |
| | Xerox additional Pasarrs as exhibits | 0.3 | |
| | Filing; organize files in preparation for trial | 0.35 | |
| | Deliver exhibits, chalks, etc. to courtroom; go to store purchase various supplies (ie white-out) for exhibits | 1 | |
| 5-Nov-01 | Help move chalks, exhibits etc to different courtroom; | 0.5 | |
| 8-Nov-01 | Collect all exhibits, chalks, etc. and return to NoHo office | 1.2 | |

| | | Time Spent | Notes |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| | Filing of immediate documents | 0.5 | |
| 15-Nov-01 | Filing, organizing trial documents, files, assemble folders etc etc | 4.4 | |
| 16-Nov-01 | Filing additional documents, files | 1.1 | |
| 20-Nov-01 | Pack up exhibits for FHE and box and ship | 0.5 | |
| | Collect, Xerox and assemble multiple exhibits for counsel and ship via regular mail, FEDEX. Collect, copy and assemble records and documents for self | 1.4 | |
| | Read Frank Laski's post-trial findings, and Tow York's post-trial findings in other cases; make Xeroxes for others | 0.7 | |
| | Make additional copies of of (sic) experts' reports for counsel | 0.5 | |
| 30-Nov-01 | Fax findings to Frank at home | 0.2 | |
| | Download trial transcripts from day 1, 3, and 4 | 0.4 | |
| 4-Dec-01 | Telephone call from Frank Laski re: findings; fax drafts to MHLAC | 0.2 | |
| 5-Dec-01 | E-mail from Bettina Toner seekign additional exhibits, email response; fax requested documents to Newton office | 0.6 | |
| 6-Dec-01 | Continue reviewing trial transcripts and drafting findings for sections III, IV and V; download trial transcripts to disks | 3 | |
| 7-Dec-01 | Read trial transcript fro day two (just arrived) and revise and edit findings re: sections III-V... Fax draft to Frank at homert (sic) an (sic) drafted by K Harris; consutl (sic) s/K Karris re plans for trial and pre-trial proceeding beginning 5/26 | 3 | |
| 12-Dec-01 | Filing, assembling records, exhibits, etc. used in preparation of drafting findings of fact | 2.3 | |
| 13-Dec-01 | Fax sections on active treatment sample, spec. services to Flaski | 0.3 | |

| | | Time Spent | Notes |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 27-Dec-01 | Filing; organizing; records of sample classmembers, of plaintiffs and defendants' exhibits | 5.1 | |
| 28-Dec-01 | Filing; continue filing, organizing office; relocating classmembers' files from office to library storage | 4 | |
| 14-Jan-02 | Download directions, maps to nursing home... to provider agency | 0.8 | |
| 17-Jan-02 | Assemble files on two NH residents seeking community placement; make copies for Matthew; assemble regulations regarding Medicaid fair hearings | 1.1 | |
| 29-Jan-02 | Assemble exhibits and mail to provider agency with cover letter | 0.5 | |
| 7-Feb-02 | Review fax from surrogate with newly proposed DMA hours; faxed letter advising of intent to withdraw appeal; and fax from DMA nurse specifying increased PCA hours | 0.25 | |
| 25-Feb-02 | Review correspondence and documents re: appeal ; assemble; and file | 0.8 | |
| 28-Feb-02 | Filing; create files, labels, etc. fo rsaved documents from boxex in library/storage | 1 | |
| 1-Mar-02 | Continue labeling and filing sorted records from library/storage | 1.8 | |
| 5-Mar-02 | Continue rifling storage files, assembling folders as needed, shredding documents with personal data | 2.2 | |
| 15-Mar-02 | Telephone and emails to Frank Laski re: rescheduled meeting with DMR | 0.3 | |
| 18-Mar-02 | Filing of new folders from saved documents from first trial production of documents | 3.1 | |
| 29-Mar-02 | Review client records: recycle and shred accordingly | 2.1 | |
| 29-Mar-02 | Filing; continue working through storage files | 1 | |

| | | Time Spent | Notes |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------------------------------------------------------------------------|
| 8-Apr-02 | File management; remove all previous four files, all dated medical records for classmembers whom we visited in 2000 and 2001; reorganize and file in storage | 55 | 55 hours is the amount of time Ms. Boundy reported working on April 8, 2002. |
| 9-Apr-02 | Continue reorganizing files and relocate files to different cabinets | 2 | |
| 5-Jun-02 | Xerox Monday's letters to sample member et al. Create labels for envelopes and mail letters to sample classmembers, guardians, social workers, advocates | 2.1 | |
| 7-Jun-02 | Assemble and collate letters for individuals with release forms; Xerox and assemble groupings letters for each provider agency; generate labels for mailings; mail letters to classmembers | 7.2 | |
| 10-Jun-02 | Fax listings of classmembers without noted provider agency to Andrea Maislen | 0.2 | |
| | Mail letters to known providers of classmembers in the community | 0.5 | |
| 11-Jun-02 | E-mail to Frank Laski re: DMR meeting availability | 0.2 | |
| 14-Jun-02 | Filing; file management; setting up new files for incoming releases, rejected letters, correspondence with guardians, providers | 1.6 | |
| 25-Jun-02 | Telephone to UMASS case manager confirming date, time of meeting re: classmember still in NF | 0.2 | |
| 28-Jun-02 | Fax pertinent records to Cathy | 0.2 | |
| 2-Jul-02 | Fax release authorization, letter to day hab provider/advocate for class member to sign | 0.4 | |
| 8-Jul-02 | File management: setting up files to track classmembers in the community, files for defendants' policy drafts re: active treatment | 1 | |

| Date | Description | Time Spent | Notes |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-------|
| 25-Jul-02 | Telephone call from guardian re: another individual and possible classmember re: missing release authorization; fax new authorization for signatures | 0.15 | |
| 5-Aug-02 | Draft letter to Andrea Maisien re: DMR's community placement tally; especially re: placements of individuals whose names do not appear in semi-annual reports. Include names and placement datets; copies to all counsel; copy and mail | 2 | |
| 16-Aug-02 | Draft letter to Rolland classmembers in the community with updated addresses provided by DMR; research online for correct zip codes; print out additional release forms; get stamps for inside envelopes ; mass mailing | 0.7 | |
| 9-Sep-02 | Find motion and resend to defendants; contact clerk's office and send via fax and mail | 0.6 | |
| 10-Sep-02 | Fax active treatment policy proposal with cover letter to DMR general counsel; call office to verify receipt | 0.3 | |
| 20-Sep-02 | File documents, trial exhibits, transcripts and other materials needed for supp appendix | 1.5 | |
| | Deliver motion in opposition to defendant's active treatment policy to Post Office before 6 pm closing | 0.3 | |

| Date | Time Spent | Notes |
|-----------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 30-Dec-02 | 3 | Cull through database of Rolland members living in the community and designate classmember who never received letters requesting release authorizations in advance of monitoring visits by plaintiffs attys. Includes about 123 folks placed from March - Nov. -02. Xerox copies of release authorization. Draft letter, start writing letters |

371.8
\$75.00
\$27,885.00